

S0031



State of Louisiana

Department of Environmental Quality



KATHLEEN BABINEAUX BLANCO
GOVERNOR

October 20, 2005

MIKE D. McDANIEL, Ph.D.
SECRETARY

Donald Silawsky
U.S. Department of Energy
Office of Petroleum Reserves (FE-47)
1000 Independence Avenue, S.W.
Washington, DC 20585-0301

RE: Proposed Expansion of the Strategic Petroleum Reserve
West Hackberry (AI# 9002), Bayou Choctaw (AI# 9005), Clovelly and
Chacahoula, Louisiana

Dear Mr. Silawsky:

The Office of Environmental Assessment, Air Quality Assessment Division, acknowledges receipt of a copy of your letter dated September 13, 2005, addressed to Secretary Mike McDaniel and containing information relative to proposed expansion of two existing Strategic Petroleum Reserve (SPR) sites and the possible development of a new SPR site in southern Louisiana. We understand that this proposed DOE action is in response to a 2005 Energy Policy Act mandate to expand oil storage capacity of the SPR from 727 million barrels to 1 billion barrels.

Please be advised that with the exception of the Bayou Choctaw site, all other proposed sites are located in parishes that are in attainment of the national ambient air quality standards (NAAQS). However, modifications to the existing Bayou Choctaw storage site in Iberville Parish will require compliance with the State's general conformity regulations (LAC 33:III.14.A). General conformity applies to the proposed expansion of the Bayou Choctaw site because Iberville Parish is currently designated by US EPA as an 8-hour ozone nonattainment parish and is classified as marginal. For this marginal nonattainment area, ozone-precursor *de minimis* levels are set at 100 tons per year per pollutant (volatile organic compounds and nitrogen oxides). Accordingly, LDEQ requests that DOE address these general conformity issues in the forthcoming draft Environmental Impact Statement.

Should you have any questions regarding state rules and regulations pertaining to general conformity, please contact me directly at [REDACTED] or Mr. Ron Rebouche of my staff at [REDACTED]. Thank you for affording us the opportunity to comment on this proposed DOE action.

Sincerely,

Teri F. Lanoue

Teri F. Lanoue
Environmental Scientist Manager
Air Quality Assessment Division

TFL:RR

c: Dr. Chuck Carr Brown, OES
Wilbert Jordan, OEA
Peggy Wade, EPA Region 6

